

DECLARATION OF VILERKA S. BILBAO

I, Vilerka Solange Bilbao, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify, I could and would do so competently and truthfully to these matters.
2. I am the Founding Attorney of Bilbao Law, LLC, which I opened in 2019. My firm specializes in immigration law and helps immigrants in the United States to navigate the complex immigration system. We handle a wide variety of immigration matters and petitions for immigration relief and provide legal representation to detained and non-detained individuals throughout Florida.
3. I am admitted to the Florida Bar and remain in good standing.
4. I represent Yuniel Michell Figueredo Corrales, who has been detained at “Alligator Alcatraz” since July 11, 2025. He is currently my only client at this facility as this date. However, my firm plans to continue representing clients detained at the facility.
5. Mr. Figueredo Corrales entered the United States on or about July 4, 2022, through the Southern Border. He was fleeing persecution from Cuba and wanted to reunite with his father, a US citizen and Cuban refugee. When he arrived at the port of entry, he presented himself to US authorities for inspection. He was then detained for 16 days at the border.
6. While detained, Mr. Figueredo Corrales passed a credible fear interview, which granted him permission to pursue an asylum claim. He was released from detention with an I-220(A) “Order of Release on Recognizance” and issued a Notice to Appear.
7. After being released from detention, Mr. Figueredo Corrales reunited with his partner. They lived together and focused on regularizing his immigration status. Mr. Figueredo Corrales retained an attorney who did not provide him with effective counsel. The attorney failed to properly screen him for forms of relief and did not file his asylum claim. Mr. Figueredo Corrales then hired a document preparer and filed for adjustment of status under the Cuban Adjustment Act. Later, he retained a second attorney to represent him in immigration court. This attorney also did not properly screen him, did not file his asylum claim, and failed to represent him adequately at his hearing in immigration court on July 11, 2025.
8. In addition to asylum and adjustment of status, there were other forms of relief to pursue for Mr. Figueredo Corrales that should have been obvious to his attorneys—especially since his father is a United States citizen and he has a stable, long-term relationship with a lawful permanent resident he intends to marry. My firm filed an I-130 based on his

father's citizenship. We also filed an appeal to the Board of Immigration Appeals (BIA) challenging the Immigration Judge's decision to grant a Motion to Terminate his case. That appeal remains pending. Additionally, I am working with his family to prepare a *Lozado* claim for ineffective assistance of counsel against his former attorneys.

9. Prior to his detention, Mr. Figueredo Corrales appeared before the Miami Immigration Court for removal proceedings on July 11, 2025. At the hearing, the Immigration Judge presiding over Mr. Figueredo Corrales's removal proceedings granted DHS's Motion to Terminate his case—likely because he never filed an asylum application. As a result, he was left without protection from detention and expedited removal.
10. When Mr. Figueredo Corrales stepped out of the courtroom that day, he was detained by ICE and transferred directly to “Alligator Alcatraz” where he remains in custody. His then attorney was not present during this encounter, as he had notified Mr. Figueredo Corrales the day before that he would only be present at the hearing virtually, despite being paid to attend the hearing in person.
11. On July 16, 2025, my firm was retained to represent Mr. Figueredo Corrales in his immigration matters.
12. Since *C.M. v. Noem* was filed, I have heard that attorneys have sometimes been able to secure in-person or virtual visits with their clients. However, from personal experience, I know these visits are unreasonably difficult to obtain.
13. Due to the many barriers to accessing my client, I cannot proceed with his asylum claim. I have not had the opportunity to gain a full understanding of Mr. Figueredo Corrales's case and require much more information from him. Neither my client nor I are aware of any complaint or grievance process available to him at this time.
14. Normally, when someone is in ICE custody, I can access official guidance about channels of communication on facility websites. Publicly available facility information usually includes visitation hours, email contacts, Video Attorney Visits (VAVs), and procedures for exchanging legal documents.
15. When I tried to find instructions for contacting or visiting Mr. Figueredo Corrales, there was no publicly available information. I could not locate an email address, phone number, or web page for making requests, nor any guidance on exchanging legal documents with detained individuals at “Alligator Alcatraz.” To my knowledge, DHS and ICE websites still provide no information on accessing or representing clients held there, and I am unaware of any Florida state website that does so.

16. I was only able to piece together any contact information or protocols for attorney access at Alligator Alcatraz was through coalitions and attorney groups I belong to. Participating in these groups requires an investment of time in addition to daily work. Not all attorneys can do that. If I were not active in these groups, I would have had no way to determine even the most basic steps for contacting clients detained at “Alligator Alcatraz.” Just determining the email address to submit a visitation request required a tip from a fellow attorney.
17. Mr. Figueredo Corrales does not even appear on ICE’s public online detainee locator (<https://locator.ice.gov/odls/>). As of August 8, 2025, the locator still shows “0” results when I enter his information (see Ex. A).
18. The only way my client can communicate with me is through a phone line that “Alligator Alcatraz” monitors and records. These unreasonable restrictions have prevented me from providing the full and zealous representation my client has a right to. Normally, I would have at least one legal call with a client within a week of having been retained—and more often an in-person visit usually lasting an hour or more. Detention facilities typically offer Video Attorney Visit (“VAV”) calls with as little as 24 hours’ notice.
19. Not once has my client called me on the telephone because of both the lack of confidentiality and the lack of availability. Instead, most of the information I have received about Mr. Figueredo Corrales has had to be communicated to me through his partner—if he is able to reach her at all. He has reported that he struggles to have five minutes on the phone with her, as people are fighting over the limited phone access.
20. On July 16, 2025, at 5:33 p.m. EST, I submitted a request for a legal visit with Mr. Figueredo Corrales (see Ex. C at p. 2). My request was for a meeting via phone or video rather than an in-person visit. However, I have received numerous reports from other members of groups such as American Immigration Lawyers Association (AILA) that attorneys have traveled all the way to the Everglades to visit their clients in-person only to be turned away. I submitted my request pursuant to the advice of attorneys in these groups, and emailed “[legal@privacy6.com](mailto:legal@privacy6.com).” I thought this was strange, as I had never engaged with any facility, officer, or staff member regarding immigration legal services over any email address that didn’t include a “.ice.dhs.gov” or at least the name of the detention facility. I made sure to attach my ID and bar card to my request and provided eight slots of availability (see Ex. C at p. 3). I also requested that the visitation be at the recipient’s “earliest convenience” (see Ex. C at p. 2).
21. On July 17, 2025, at 1:52 p.m. EST, the facility replied with instructions to complete and return a visit request form instead of confirming an appointment. The email was signed by the “Southern Detention Coordination Team” (see Ex. C at p. 2). I have never heard of this entity. It is unclear who they are or why I am required to submit sensitive client

information to them. I returned the form promptly at 2:24 p.m. EST the same day, given the urgent nature of my client's legal needs. I did not receive a reply.

22. On July 18, 2025, at 11:25 a.m. EST, I sent a follow-up email and still did not receive a reply (see Ex. C at p. 3).
23. On July 21, 2025, at 11:36 a.m. EST, I sent another follow-up email, reattaching the attorney request form, a G-28, my ID, and my bar card. I emphasized that I had not yet received a response (see Ex. C at p. 4). I also stated that "I am available and prepared to meet with my client through the fastest available medium permitted by the facility" and asked that they "[p]lease confirm the scheduled visitation at [their] earliest convenience." I further asserted that I "remain available and committed to speaking with my client as soon as possible" (see Ex. C at p. 4).
24. Finally, on July 22nd, 2025, at 10:14 a.m. I received a response. This one did confirm an appointment time. However, the appointment I was given was set for July 24, 2025, at 9:00 a.m. EST—eight days after sending my initial request.
25. I emailed [legal@privacy6.com](mailto:legal@privacy6.com) again on August 6, 2025, to request a follow up video call with my client. It was scheduled for August 11, 2025 - the day his BIA appeal is due (see Ex. C at pp. 7-8).
26. Through other attorneys, I have learned that "Alligator Alcatraz" requires submission of a signed Form G-28 (Notice of Entry of Appearance) before granting permission to conduct an attorney-client visit. This is an unreasonable and impractical requirement. There is no way for me to obtain my client's signature on a G-28 before I am allowed to meet with him.
27. This requirement makes pre-representational consultation in person completely impossible. In many cases, it would be inappropriate to file a G-28 at that stage, since the client and I may not yet have agreed to proceed with representation. In every other detention facility where I conduct in-person visits, it has always been sufficient to submit a G-28 after the visit once representation is confirmed. I have never been required to submit a signed G-28 in advance simply to speak with a current or prospective client.
28. The single video visit I have been able to obtain was scheduled for forty-five minutes. Facility staff brought Mr. Figueredo Corrales in twenty minutes late and did not adjust the cut off time for the call. So, we only had twenty minutes total to speak about his case.
29. Our communication on the video call was clearly not confidential. Mr. Figueredo Corrales sat in a sort of tent with soft-sided, makeshift fabric walls and no roof. There were guards standing close by. Guards are always present when detained individuals are in unsecured and unenclosed areas, like these makeshift visitation rooms. These open and non-confidential visitation tents are very much unlike any other facility I have ever seen. Typically, detention facilities provide enclosed confidential rooms for attorney-client

visitation. Although they usually have transparent windows, no conversation can be heard from outside the rooms. When I expressed concern about the lack of privacy and guards being able to hear our conversation through the fabric walls, especially given that there wasn't even a roof above us, Mr. Figueredo Corrales replied that he was glad there was no roof because he hadn't seen the sun or been outside at all in fourteen days.

30. It also remains impossible to exchange legal documents confidentially with clients at the facility. Prior to my video visit, I requested copies of any documents Mr. Figueredo Corrales had and any documents he had been given while in custody. As he does not understand English, he could not comprehend their contents. My client was prohibited from bringing any of his documents with him to our meeting and I was never provided copies. These barriers have delayed my ability to review the documents with him, explain their contents, and obtain critical information and personal data needed for his filings—all of which are time-sensitive, particularly given his pending appeal.
31. Mr. Figueredo Corrales has explained that staff at the facility go from cell to cell pressuring individuals to sign documents agreeing to voluntary removal. These detainees have not had the opportunity to speak with legal counsel. He is afraid to sign anything that might result in his deportation. Staff reportedly make these rounds while people are sleeping, call names, and request signatures on documents without explanation. They have told individuals that they are required to sign the documents, that they have no right to see a judge, and—if someone questions or hesitates—that they will be deported regardless.
32. This has created such deep distrust in my client that, when our office sent legal mail requiring his signature for FOIA requests, he initially refused to sign. We needed to submit the requests quickly to obtain a complete and accurate record of his immigration history, but his fear of falling victim to ICE's coercive tactics caused a delay. That fear is rooted in his knowledge of other immigrants who unknowingly signed documents that led to their deportation. As a result, he is now experiencing ongoing episodes of dissociation, which directly impair a person's ability to participate in their legal defense.
33. Mr. Figueredo Corrales's partner has reported his deteriorating well-being in detention. He told her that several people were running fevers and showing COVID symptoms without being separated from the general population; that bathrooms were often out of order or overflowing; that rainwater regularly flooded the tents; and that medical requests were ignored. He said he had been unable to bathe or brush his teeth for days, was extremely hungry, and that the food provided was poor in quality. He and others cannot tell whether it is day or night unless they ask because there is no natural light or clock. He also reported that the phones were disconnected over a weekend, and when he finally reached his partner at 3:00 p.m., he had not eaten since 6:00 a.m. the previous day. According to his partner, he said the situation at the facility was worsening.
34. These conditions are not only inhumane—the lack of basic care and communication access directly obstruct my ability to provide effective representation. Even with

reasonable communication and legal access, a client cannot meaningfully participate in their own defense while physically and mentally deteriorating.

35. On August 8, 2025, I submitted bond motions on behalf of Mr. Figueredo Corrales to the Krome Immigration Court, the Miami Non-detained Court, and the Orlando Non-detained Immigration Court. The motion included evidence of his pending appeal, a pending I-130 filed by his U.S. citizen father, letters of recommendation, and sponsorship and financial documents from both his father and his long-term partner, who plans to marry him. The Miami and the Orlando Courts both terminated Mr. Figueredo Corrales's bond motions without hearing or written decision (see Exs. B and E). A bond hearing is scheduled at the Krome Immigration Court (see Ex. D); however, based on other attorneys' experiences before that court, I am concerned the Immigration Judge will deny the motion in person for lack of jurisdiction—even though he is likely eligible for bond—because Mr. Figueredo Corrales is detained at “Alligator Alcatraz.”

Executed on 12th of August, 2025, at Jacksonville, Florida.

/s/ \_\_\_\_\_  
Vilerka Solange Bilbao

## **EXHIBIT LIST**

**Exhibit A-** Screenshot – ICE Detainee Locator Indicating “No Record Found” (Aug. 8, 2025)

**Exhibit B** – First Notice from Immigration Court Rejecting Bond Filing (Aug. 8, 2025)

**Exhibit C** - Email Correspondence Regarding Attorney—Client Visitation Requests (July 16, 2025 – August 6, 2025)

**Exhibit D** – Notice from Krome Immigration Court Scheduling Custody Redetermination Hearing (Aug. 19, 2025)

**Exhibit E** – Second Notice from Immigration Court Rejecting Bond Filing (Aug. 11, 2025)

**EXHIBIT A**

Screenshot — ICE Detainee Locator Indicating “No Record Found”





U.S. Immigration  
and Customs  
Enforcement

Report Crimes: Email or Call 1-866-DHS-2-ICE

[Home](#)

[Who We Are](#)

[What We Do](#)

[Newsroom](#)

[Information Library](#)

[Contact ICE](#)

## Search Results: 0

Your search has returned zero (0) matching records. Please re-check the search terms you entered to ensure they are correct and try your query again. Please remember the system does not provide information for detainees under the age of 18.

If you conducted a name-based search, please remember that only exact matches to the name you entered will be returned. You may want to try searching any name or spelling variants used by the detainee.

If you conducted an A-Number search you may want to try conducting a name-based search instead.

If you are unable to find the detainee using the Online Detainee Locator System, please contact your [local field office](#).

For more information on the Missing Migrant Program please visit [link](#).

[BACK TO SEARCH >](#)

## Related Information

### Helpful Info

[Status of a Case](#)

[About the Detainee Locator](#)

[Brochure](#)

[ICE ERO Field Offices](#)

[ICE Detention Facilities](#)

[Privacy Notice](#)

### External Links

[Bureau of Prisons Inmate Locator](#)



[DHS.gov](#)

[USA.gov](#)

[OIG](#)

[Open Gov](#)

[FOIA](#)

[Metrics](#)

[No Fear Act](#)

[Site Map](#)

[Site Policies & Plug-Ins](#)



**EXHIBIT B**

First Notice From Immigration Court Rejecting Bond Filing (Aug. 8, 2025)



**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT**

Respondent Name:

N/A

A-Number:

[REDACTED]

Address:

REJECTION NOTICE

Date: 08/08/2025

**REJECTED FILING  
NOTICE TO ATTORNEY OR REPRESENTATIVE**

This notice is to inform you that the document(s) received by the Immigration Court on 08/08/2025 is/are being rejected for the reasons given below. When re-filing the corrected document(s) other than initiation documents, please attach this rejection notice. A copy of the corrected filing must also be served on the opposing party.

Document(s) being rejected:

A [REDACTED].Motion for Custody Redetermination.pdf, EOIR-28.pdf

Rejection Reason(s)

1. Incorrect Filing Location (Wrong Immigration Court)

Rejection Explanation:

**Certificate of Service**

This document was served:

Via: ☐ Mail ☐ Personal Service ☒ Electronic Service

To: ☒ Alien ☐ Alien c/o custodial officer ☐ Alien's atty/rep. ☐ DHS

By: MongeJ, ☐ Court Staff ☐ Immigration Judge

Date: 08/08/2025

**EXHIBIT C**

Email Correspondence Regarding Attorney–Client Visitation Requests  
(July 16, 2025 – August 6, 2025)



Vilerka Bilbao <vilerka@bilbaolaw.com>

**URGENT: Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED])**

10 messages

Vilerka Bilbao <vilerka@bilbaolaw.com>  
To: legal@privacy6.com

Thu, Jul 17, 2025 at 2:24 PM

Find attached completed Attorney Visitation Request Form.

Please note that I am requesting a Legal Visitation Phone or Virtual call with my client.

I am located in Jacksonville, FL.

For the call - Please contact me to my direct phone line at **(904) 514-3655**.

**Thank you,**

**Vilerka Solange Bilbao, Esq.**



5911 Timuquana Road, Suite 301  
Jacksonville FL 32210  
Ph./Tel.: (904) 300-0825  
*Hours of Operation / Horas de Operación:*  
Monday through Friday / Lunes a Viernes  
9AM - 5PM EST



**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

On Thu, Jul 17, 2025 at 1:52 PM TNT - Legal <legal@privacy6.com> wrote:

Dear counsel,

Thank you for contacting the South Detention Facility to request an appointment with your client.

Attached to this email is the **Attorney Visit Request Form**. Please complete the form in its entirety and return it via email to [legal@privacy6.com](mailto:legal@privacy6.com).

Once received, our team will review the information and reach out to you to schedule your visit accordingly.

As we continue to develop and expand direct legal access resources at the facility, please be assured that we are working diligently to ensure timely, secure, and reliable attorney-client communication. We recognize the importance of these interactions and are committed to continuously improving the systems that support them.

We sincerely appreciate your patience and understanding as we enhance our processes to better serve both legal counsel and the individuals in our care.

If you have any urgent matters or require further assistance, please include that in your response.

Thank you for your cooperation.

Respectfully,

Southern Detention Coordination Team

[legal@privacy6.com](mailto:legal@privacy6.com)

---

**From:** Vilerka Bilbao <[vilerka@bilbaolaw.com](mailto:vilerka@bilbaolaw.com)>  
**Sent:** Wednesday, July 16, 2025 5:33 PM  
**To:** TNT - Legal <[legal@privacy6.com](mailto:legal@privacy6.com)>  
**Cc:** Luana Bilbao <[luana@bilbaolaw.com](mailto:luana@bilbaolaw.com)>; Mary Marlar <[mary@bilbaolaw.com](mailto:mary@bilbaolaw.com)>  
**Subject:** Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED])

Good afternoon,

I've been retained to represent Mr. **Yuniel FIGUEREDO CORRALES (A# [REDACTED])** in his immigration matters. Please **find attached the Form G-28**, which has also been submitted electronically to ICE.

I am requesting a legal visitation (video/phone) with my client for 30 minutes and am available during the following dates and times:

**THURSDAY, July 17th**

- 10:00 AM EST
- 10:30 AM EST
- 11:00 AM EST

**FRIDAY, July 18th**

- 10:00 AM EST
- 10:30 AM EST
- 12:00 PM EST
- 12:30 PM EST
- 2:00 PM EST
- 2:30 PM EST

Please dial my direct line at **(904) 514-3655** for the call.

In addition, **we will be sending legal mail to our client** and would appreciate it if you could kindly provide us with the **proper mailing instructions for legal correspondence to be received** and delivered to Mr. Figueredo Corrales.

Attached are my **bar card and government-issued identification** for verification purposes.

Please confirm the scheduled visitation at your earliest convenience.

Thank you,

**Vilerka Solange Bilbao, Esq.**

# BilbaoLaw

DEFENDING IMMIGRANT & HUMAN RIGHTS

5911 Timuquana Road, Suite 301  
Jacksonville FL 32210  
Ph./Tel.: (904) 300-0825  
*Hours of Operation /Horas de Operación:*  
Monday through Friday / Lunes a Viernes  
9AM - 5PM EST



**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

*This email has been scanned by Inbound Shield.*

## 2 attachments

**VB - Attorney Visit Request Form.pdf**  
451K

**VB DL + FL Bar Card.pdf**  
1334K

Vilerka Bilbao <vilerka@bilbaolaw.com>  
To: legal@privacy6.com

Fri, Jul 18, 2025 at 11:25 AM

Good afternoon,

Following up the status of this requested legal call.

Best regards,

Vilerka Solange Bilbao, Esq.

# BilbaoLaw

DEFENDING IMMIGRANT & HUMAN RIGHTS

5911 Timuquana Road, Suite 301  
Jacksonville FL 32210  
Ph./Tel.: (904) 300-0825  
*Hours of Operation /Horas de Operación:*  
Monday through Friday / Lunes a Viernes  
9AM - 5PM EST



**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

[Quoted text hidden]



Vilerka Bilbao <vilerka@bilbaolaw.com>  
 To: legal@privacy6.com, admin@southerndetention.com, southfacility@em.myflorida.com  
 Cc: Luana Bilbao <luana@bilbaolaw.com>

Mon, Jul 21, 2025 at 11:36 AM

Dear Southern Detention Coordination Team,

I am following up regarding my prior legal visitation request submitted for Mr. **Yuniel Figueredo Corrales (A# [REDACTED])**, as I have not yet received a response.

Out of an abundance of caution, I am now resending this request to all relevant contact addresses. I am available and prepared to meet with my client through **the fastest available medium permitted by the facility (video or telephone is preferred)**.

I am proposing the following new windows of availability for a virtual legal visit:

- **Wednesday, July 23rd: 2:00 PM – 3:30 PM (EST)**
- **Thursday, July 24th: 9:00 AM – 12:00 PM (EST)**

Please confirm the scheduled visitation at your earliest convenience. For the virtual visit, I ask that the facility please dial my direct line at **(904) 514-3655**.

Attached to this email, please find:

- A completed Form G-28 (Notice of Appearance)
- A copy of my Florida Bar card
- A copy of my government-issued Florida ID
- Attorney Visitation Request Forms for **each proposed date**

I remain available and committed to speaking with my client as soon as possible. Please advise if any additional information is needed to confirm the visit.

Thank you in advance for your attention to this matter.

Sincerely,

**Vilerka Solange Bilbao, Esq.**

**BilbaoLaw**

DEFENDING IMMIGRANT & HUMAN RIGHTS

5911 Timuquana Road, Suite 301

Jacksonville FL 32210

Ph./Tel.: (904) 300-0825

*Hours of Operation /Horas de Operación:*

Monday through Friday / Lunes a Viernes

9AM - 5PM EST







**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

[Quoted text hidden]

4 attachments

-  **07.23.2025 Attorney Visit Request Form .pdf**  
568K
-  **07.24.2025 Attorney Visit Request Form.pdf**  
570K
-  **G-28 [Electronic] - Yuniel FIGUEREDO CORRALES A [REDACTED].pdf**  
526K
-  **VB DL + FL Bar Card.pdf**  
1334K

**Luana Bilbao** <luana@bilbaolaw.com>  
To: vilerka@bilbaolaw.com

Mon, Jul 21, 2025 at 11:38 AM

Your message

To: Luana Bilbao  
Subject: Fwd: URGENT: Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED] 7)  
Sent: 7/21/25, 12:36:39 PM EDT

was read on 7/21/25, 12:38:25 PM EDT

**TNT - Legal** <legal@privacy6.com>  
Reply-To: legal@privacy6.com  
To: Vilerka Bilbao <vilerka@bilbaolaw.com>, Admin SD <admin@southerndetention.com>, southfacility@em.myflorida.com  
Cc: Luana Bilbao <luana@bilbaolaw.com>

Tue, Jul 22, 2025 at 10:13 AM

Dear Counsel;  
Your video visit is scheduled for Thursday, July 24, at 9 am. You will receive an email with a Zoom link and instructions for the visit.

Respectfully,

Southern Detention Coordination Team

**From:** Vilerka Bilbao <vilerka@bilbaolaw.com>  
**Sent:** Monday, July 21, 2025 12:36 PM  
**To:** TNT - Legal <legal@privacy6.com>; Admin SD <admin@southerndetention.com>; southfacility@em.myflorida.com <southfacility@em.myflorida.com>  
**Cc:** Luana Bilbao <luana@bilbaolaw.com>  
**Subject:** Fwd: URGENT: Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED])

[Quoted text hidden]

**3 attachments**



**TNT - Legal** <legal@privacy6.com>  
Reply-To: legal@privacy6.com  
To: Vilerka Bilbao <vilerka@bilbaolaw.com>, Admin SD <admin@southerndetention.com>  
Cc: Luana Bilbao <luana@bilbaolaw.com>

Tue, Jul 22, 2025 at 12:52 PM

Good Afternoon, attached bellow you will find zoom link for 7/24/2025 @ 9am

<https://us05web.zoom.us/j/88581894904?pwd=qg8RvYYVowb7TZcDj8SFboknWEwN9.1>

Meeting ID: 885 8189 4904

Passcode: 858364

Respectfully,

Southern Detention Coordination Team

---

**From:** TNT - Legal <legal@privacy6.com>

**Sent:** Tuesday, July 22, 2025 11:13 AM

**To:** Vilerka Bilbao <vilerka@bilbaolaw.com>; Admin SD <admin@southerndetention.com>; southfacility@em.myflorida.com <southfacility@em.myflorida.com>

**Cc:** Luana Bilbao <luana@bilbaolaw.com>

[Quoted text hidden]

[Quoted text hidden]

---

**3 attachments**



**attachment-1.png**  
6K



**attachment-2.png**  
2K



**attachment-3.png**  
2K

---

**Vilerka Bilbao** <vilerka@bilbaolaw.com>  
To: admin@southerndetention.com, southfacility@em.myflorida.com, legal@privacy6.com

Wed, Aug 6, 2025 at 10:28 AM

Dear Southern Detention Coordination Team,

I am submitting a legal visitation to speak to my client Mr. **Yuniel Figueredo Corrales (A# [REDACTED])**.

I am available and prepared to meet with my client through **the fastest available medium permitted by the facility (video or telephone is preferred)**.

I am proposing the following new windows of availability for a virtual legal visit:

- **Friday, August 8: 12:00PM (EST)**
- **Monday, August 11: 12PM or 4PM (EST)**

Please confirm the scheduled visitation at your earliest convenience. For phone call, I ask that the facility please dial my direct line at **(904) 514-3655**.

Attached to this email, please find:

- A completed Form G-28 (Notice of Appearance)
- A copy of my Florida Bar card
- A copy of my government-issued Florida ID
- Attorney Visitation Request Forms for **each proposed date**

I remain available and committed to speaking with my client as soon as possible. Please advise if any additional information is needed to confirm the visit.

Thank you in advance for your attention to this matter.

Sincerely,

**Vilerka Solange Bilbao, Esq.**



DEFENDING IMMIGRANT & HUMAN RIGHTS

5911 Timuquana Road, Suite 301  
Jacksonville FL 32210

Ph./Tel.: (904) 300-0825

Hours of Operation /Horas de Operación:

Monday through Friday / Lunes a Viernes





9AM - 5PM EST



**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

#### 4 attachments

-  **G-28 [Electronic] - Yuniel FIGUEREDO CORRALES A# [REDACTED].pdf**  
526K
-  **VB DL + FL Bar Card.pdf**  
1334K
-  **2025.08.08 VB - Attorney Visit Request Form.pdf**  
494K
-  **2025.08.11 VB - Attorney Visit Request Form .pdf**  
531K

TNT - Legal <legal@privacy6.com>

Wed, Aug 6, 2025 at 1:05 PM

Reply-To: legal@privacy6.com

To: Vilerka Bilbao <vilerka@bilbaolaw.com>, Admin SD <admin@southerndetention.com>, southfacility@em.myflorida.com

Dear Counsel;

The first available is an in-person visit August 7, 8, or 9. The first available video visit is August 11 at 12 pm. Please advise as to your preference.

Respectfully,

Southern Detention Coordination Team

**From:** Vilerka Bilbao <vilerka@bilbaolaw.com>

**Sent:** Wednesday, August 6, 2025 10:28 AM

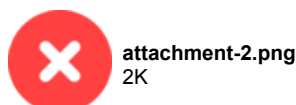
**To:** Admin SD <admin@southerndetention.com>; southfacility@em.myflorida.com <southfacility@em.myflorida.com>; TNT - Legal <legal@privacy6.com>

**Subject:** Fwd: URGENT: Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED])

[Quoted text hidden]

*This email has been scanned by Inbound Shield.*

#### 3 attachments





attachment-3.png  
2K

Vilerka Bilbao <vilerka@bilbaolaw.com>  
To: legal@privacy6.com

Wed, Aug 6, 2025 at 2:31 PM

August 11 at 12PM through video please.

**Vilerka Solange Bilbao, Esq.**

**BilbaoLaw**

DEFENDING IMMIGRANT & HUMAN RIGHTS

5911 Timuquana Road, Suite 301  
Jacksonville FL 32210

Ph./Tel.: (904) 300-0825

Hours of Operation /Horas de Operación:

Monday through Friday / Lunes a Viernes

9AM - 5PM EST



**English:** This communication may contain privileged or confidential information and is intended only for the use of the person named above. If you are not the intended recipient, or you have received this in error, do not print, copy, distribute or use the information as it is strictly prohibited. You must indicate to the sender that you received this email in error, and delete the copy you receive. This email is covered by the Electronics Communications Privacy Act, 18 U.S. C. §§ 2510-2521, and is legally privileged. It may also be protected under the attorney-client privilege & the attorney work product doctrine.

**Español:** Esta comunicación puede contener información privilegiada o confidencial y está destinada únicamente para el uso de la persona mencionada anteriormente. Si no es el destinatario previsto, o lo ha recibido por error, no imprima, copie, distribuya ni utilice la información, ya que está estrictamente prohibido. Debe indicar al remitente que recibió este correo electrónico por error y eliminar la copia que recibe. Este correo electrónico está cubierto por la Ley de Privacidad de Comunicaciones Electrónicas, 18 U.S. C. §§ 2510-2521, y es legalmente privilegiado. También puede estar protegido por el privilegio abogado-cliente & la doctrina del producto del trabajo del abogado.

[Quoted text hidden]

TNT - Legal <legal@privacy6.com>

Wed, Aug 6, 2025 at 2:48 PM

Reply-To: legal@privacy6.com

To: Vilerka Bilbao <vilerka@bilbaolaw.com>

Dear Counsel;

Your video visit is scheduled for August 11 at 12 pm. You will receive a Zoom link prior to the call.

Respectfully,

Southern Detention Coordination Team

**From:** Vilerka Bilbao <vilerka@bilbaolaw.com>

**Sent:** Wednesday, August 6, 2025 2:31 PM

**To:** TNT - Legal <legal@privacy6.com>

**Subject:** Re: URGENT: Legal Visitation Request – Yuniel FIGUEREDO CORRALES (A# [REDACTED])

[Quoted text hidden]

3 attachments



attachment-1.png  
6K



attachment-2.png  
2K



attachment-3.png  
2K

**EXHIBIT D**

Notice from Krome Immigration Court Scheduling  
Custody Redetermination Hearing (Aug. 19, 2025)



IMMIGRATION COURT  
18201 SW 12TH ST, BLDG 1 STE C  
MIAMI, FL 33194

Bilbao Law  
Bilbao, Vilerka Solange  
5911 Timuquana Rd  
Unit 301  
Jacksonville, FL 32210

FILE: [REDACTED]

RE: FIGUEREDO CORRALES, YUNIEL MICHELL

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN  
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE  
IMMIGRATION COURT ON Aug 19, 2025 AT 08:00 A.M. AT THE FOLLOWING ADDRESS:

18201 SW 12TH ST, BLDG 1 STE C  
MIAMI, FL 33194

YOU MAY BE REPRESENTED IN THIS PROCEEDING, AT NO EXPENSE TO THE GOVERNMENT, BY  
AN ATTORNEY OR OTHER INDIVIDUAL AUTHORIZED AND QUALIFIED TO REPRESENT PERSONS  
BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY  
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

---

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL ☐ PERSONAL SERVICE ☐ ELECTRONIC SERVICE ☐  
TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS  
DATE: 8/11/25 BY: COURT STAFF DR  
Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

---

U7

**EXHIBIT E**

Second Notice from Immigration Court Rejecting Bond Filing (Aug. 11, 2025)



**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT**

Respondent Name:

N/A

A-Number:

[REDACTED]

Address:

REJECTION NOTICE

Date: 08/11/2025

**REJECTED FILING  
NOTICE TO ATTORNEY OR REPRESENTATIVE**

This notice is to inform you that the document(s) received by the Immigration Court on 08/08/2025 is/are being rejected for the reasons given below. When re-filing the corrected document(s) other than initiation documents, please attach this rejection notice. A copy of the corrected filing must also be served on the opposing party.

Document(s) being rejected:

A [REDACTED].Motion for Custody Redetermination.pdf, EOIR-28.pdf

Rejection Reason(s)

1. Incorrect Filing Location (Wrong Immigration Court)

Rejection Explanation:

PLEASE SUBMIT TO THE KROME IMMIGRATION COURT

**Certificate of Service**

This document was served:

Via: ☐ Mail ☐ Personal Service ☒ Electronic Service

To: ☒ Alien ☐ Alien c/o custodial officer ☐ Alien's atty/rep. ☐ DHS

By: ParsoC, ☐ Court Staff ☐ Immigration Judge

Date: 08/11/2025